

Nevada Bar No. 11831

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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

HARRY PARENT

Plaintiff,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 3:24-cv-00109-ART-CSD

**JOINT STIPULATION TO EXTEND TIME FOR PLAINTIFF
TO SUBSTITUTE PARTIES PURSUANT TO FRCP 25
(First Request)**

The parties, by and through their respective counsel, hereby submit the following Stipulation,
as follows:

1. In July 2024, Plaintiff's counsel learned that Plaintiff HARRY PARENT died on June 28, 2024.
2. On August 1, 2024, parties filed a joint Stipulation to Stay Discovery in which the death of HARRY PARENT is mentioned.
3. Since being notified of the death of HARRY PARENT, Plaintiff has worked to determine the identity of the individual heirs of HARRY PARENT and to obtain a copy of the death certificate of HARRY PARENT.

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- 1 4. Plaintiff's counsel has only recently been able to obtain the death certificate of HARRY
- 2 PARENT from the Gardens Funeral Home in Fallon, Nevada.
- 3 5. Plaintiff's counsel has identified a single heir of HARRY PARENT, a brother, DAVID
- 4 PARENT, who lives in an extremely rural area, near Errol, New Hampshire.
- 5 6. Plaintiff's counsel has identified a Nevada resident, Donnalyn VanOrman-Wasano, who is
- 6 willing a serve as a Special Administratrix of the Estate of HARRY PARENT. The
- 7 Decedent's brother, DAVID PARENT, is the sole heir of HARRY PARENT.
- 8 7. The individual heir of HARRY PARENT, DAVID PARENT, has nominated Donnalyn
- 9 VanOrman-Wasano to serve as special administratrix of the Estate of HARRY PARENT.
- 10 A petition to the Probate Division of the Eighth Judicial District Court has been prepared and
- 11 will be filed forthwith.
- 12 8. The parties believe that it is in their best interest to await until the administratrix of the Estate
- 13 of HARRY PARENT has been appointed by the Probate Court and to extend the time in
- 14 which Plaintiff has to filed a motion to substitute parties pursuant to FRCP 25, by 90 days,
- 15 until February 1, 2025.

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9. As such, the parties respectfully request that the Court extend the time in which Plaintiff may file a motion to substitute parties, pursuant to FRCP 25 by 90 days, until February 1, 2025. Once the Probate Court has appointed Donnalyn VanOrman-Wasano as special administratrix of the Estate of HARRY PARENT, Plaintiff will file a motion to substitute her as Plaintiff in the above entitled matter.

Respectfully submitted this the 22nd day of August 2024.

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/s/ Danial Laird


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JASON M. FRIERSON
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/s/ R. Thomas Colonna

R. THOMAS COLONNA
Assistant United States Attorney
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: October 23, 2024

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